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10 Attorneys for Plaintiffs

MORTGAGE ELECTRONIC

11 REGISTRATION SYSTEMS, INC. and

12 MERSCORP HOLDINGS, INC.

13 UNITED STATES DISTRICT COURT

14 CENTRAL DISTRICT OF CALIFORNIA — WESTERN DIVISION

15 CV 13-7142 SW (ASX)

16 MORTGAGE ELECTRONIC
17 REGISTRATION SYSTEMS, INC.,
and MERSCORP HOLDINGS, INC.,

18 Plaintiffs,

19 vs.

20 DANIEL W. ROBINSON and DARLA
21 J. ROBINSON,

22 Defendants.

Case No.

COMPLAINT:

1. TO SET ASIDE VOID JUDGMENT
2. DECLARATORY JUDGMENT FOR VIOLATION OF DUE PROCESS
3. CANCELLATION OF INSTRUMENTS
4. SLANDER OF TITLE

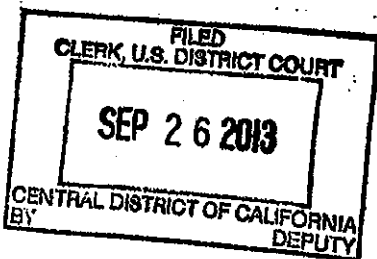
23 Plaintiffs MORTGAGE ELECTRONIC REGISTRATION SYSTEMS, INC.
24 ("MERS") and MERSCORP HOLDINGS, INC. allege as follows:
25

26 Jurisdiction

27 1. The Court has jurisdiction over this action under 28 U.S.C. § 1331,
28 which confers original jurisdiction on federal district courts to hear suits alleging the

11951.0247/2880093.1

COMPLAINT



1 violation of rights and privileges under the United States Constitution. This Court
2 has supplemental jurisdiction under 28 U.S.C. § 1367 to hear the pendent state law
3 claims, in that both claims arise from a common nucleus of operative fact.

4 2. The Court also has jurisdiction over this action under 28 U.S.C. §
5 1332(a), because there is complete diversity of citizenship and the amount in
6 controversy exceeds \$75,000 exclusive of fees and costs. MERS is a corporation
7 organized under the laws of Delaware with its principal place of business in the
8 Commonwealth of Virginia. MERSCORP Holdings, Inc. is a corporation organized
9 under the laws of Delaware with its principal place of business in the
10 Commonwealth of Virginia. Defendants are citizens of and residents of California.
11 The amount in controversy exceeds \$75,000 because the void judgment at issue in
12 this action purported to eliminate a deed of trust on real property securing a
13 \$999,950.00 loan.

14 **Venue**

15 3. Venue is proper in this Court under 28 U.S.C. § 1391(b) because the
16 defendants reside in this district, because a substantial part of the events giving rise
17 to the claims occurred in this district, and because the real property that is the
18 subject of the action is situated in this district.

19 **Parties**

20 4. Plaintiff MERS is a Delaware corporation that is authorized to do
21 business in the State of California. MERS is the beneficiary of the deed of trust
22 referred to herein.

23 5. Plaintiff MERSCORP Holdings, Inc. is a corporation organized under
24 the laws of Delaware with its principal place of business in the Commonwealth of
25 Virginia. MERSCORP Holdings, Inc. is the parent company of MERS.

26 6. Defendant Daniel W. Robinson is an individual who resides in
27 Northridge, California.

1 7. Defendant Darla J. Robinson is an individual who resides in
2 Northridge, California.

3 **The Real Property**

4 8. The real property that is the subject of this action (the “Property”) is
5 located in Los Angeles County, and is commonly known as 19127 Romar Street,
6 Northridge, CA 91324, and has the legal description: “LOT 21 OF TRACT NO.
7 4324, IN THE CITY OF LOS ANGELES, COUNTY OF LOS ANGELES, STATE
8 OF CALIFORNIA. AS PER MAP RECORDED IN BOOK 1051, PAGES 29 AND
9 30 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID
10 COUNTY.”

11 9. MERS claims an interest in the Property. MERS is the beneficiary of
12 record of a deed of trust on the Property, which deed of trust was ordered expunged
13 without any notice to MERS and in violation of California law and Plaintiffs’ due
14 process rights.

15 **Background on MERS and the MERS® System**

16 10. MERS was developed in 1993 when Fannie Mae, Freddie Mac and
17 Ginnie Mae published a white paper that analyzed the need for an electronic
18 mortgage registration system for mortgage rights. The need arose due to the active
19 secondary mortgage market in the United States.

20 11. The secondary mortgage market—in which a variety of investors
21 purchase real estate loans from those who originate the loans—is critical to the
22 United States credit and housing markets because the ability of lenders to replenish
23 their credit directly impacts the lenders’ willingness to extend credit and the interest
24 rates charged for the risk the lenders assume.

25 12. Since the investors in the secondary market often consist of
26 institutional entities such as mutual funds and insurance companies, those entities
27 often contract with servicing companies to handle the loan servicing obligations.
28

1 13. Typically, the investor or its designee would hold the note, with the
2 servicing company appearing as the mortgagee or beneficiary in the land records for
3 the purposes of that mortgagee or beneficiary directly receiving notice of legal
4 proceedings against the mortgage property or collateral. If the servicing rights in the
5 loan were sold, it was necessary to record the assignment of the mortgage or deed of
6 trust from the old servicer to the new servicer so that the identity of the new servicer
7 would appear in the land records in order for that new entity to receive service of
8 process pursuant to their servicing contract with the investor. The process of
9 drafting and recording multiple assignments was costly and burdensome. Simple
10 economics dictates that these costs were ultimately passed to the consumers—
11 buyers and sellers of real estate.

12 14. In addition, multiple assignments of mortgage interests led to errors and
13 uncertainty in the chain of title because assignments were often missing, incomplete,
14 inaccurate, or misfiled.

15 15. These problems led consumer-oriented government corporations and
16 agencies, including Fannie Mae, Freddie Mac, Ginnie Mae, the Federal Housing
17 Administration, and Department of Housing and Urban Development, and the
18 Department of Veterans Affairs, to participate in the creation of MERS and the
19 MERS® System, with many of these entities serving on MERS' Steering
20 Committee and Advisory Council.

21 16. Every mortgage registered on the MERS® System has a unique
22 mortgage identification number. The borrower executes a deed of trust or mortgage
23 (depending on the state) that is recorded in the public land records.

24 17. Every lender that registers a mortgage on the MERS® System signs a
25 MERS® System membership agreement which states, in part, that "Mortgage
26 Electronic Registration Systems, Inc. is a wholly owned subsidiary of MERSCORP
27 Holdings, Inc. created for the purpose of serving as the Mortgagee of Record in the
28

1 applicable public land records solely as Nominee for the Note Owner and the Note
2 Owner's successors and assigns, including the Note Holder."

3 18. Pursuant to this authority, when a deed of trust or mortgage identifying
4 MERS as the beneficiary or mortgagee is signed by the borrower(s) as part of a
5 mortgage loan "closing" or transaction, that document grants a security interest in
6 the subject property to MERS as beneficiary/mortgagee as nominee for the lender
7 and the lender's successors and assigns. MERS holds legal title to the interests
8 granted in the mortgage (or, in a deed of trust, the trustee holds legal title on behalf
9 of MERS as beneficiary and nominee) and generally has the right, as nominee for
10 the current note owner or holder, to exercise any or all of the lender's interests in the
11 property under the deed of trust.

12 19. MERS will typically remain the mortgagee or beneficiary of record
13 throughout the life of the loan on behalf of the original lender and its successors and
14 assigns. In addition to MERS's identification in public land records as mortgagee or
15 beneficiary, transfers between lenders of servicing rights are tracked electronically
16 through the MERS® System.

17 20. Members pay annual membership and transaction fees for the right to
18 use MERS as the mortgagee and nominee in public land records and utilize the
19 MERS® System.

20 21. In California, MERS has approximately 3.5 million active loans for
21 which it acts as the recorded beneficiary.

22 22. MERS and the MERS® System have eliminated the need to scour land
23 records (at least for properties with MERS as the recorded beneficiary) in search of
24 multiple assignments that may have been filed incorrectly or not filed at all. This
25 has facilitated title companies' ability to efficiently and accurately provide lien
26 releases and title opinions, to the benefit of real estate purchasers.

27 23. The MERS® system allows for quick and accurate identification of the
28

1 mortgage servicer on a particular loan. Servicers are usually the only parties with
 2 access to the payoff statement—information that, for example, helps homeowners
 3 avoid foreclosure, exercise their right of redemption, and close on the sale of their
 4 home. Since the MERS® System is entirely electronic, it can provide consumers,
 5 title companies and purchasers with instantaneous on-line access to information
 6 about who is servicing a particular loan.

7 24. MERS and the MERS® System thus provides several significant
 8 benefits to consumers who buy and sell real estate and member companies, in that:

- 9 a. It fosters the creation of new credit and reduces the costs of
 10 credit;
- 11 b. It provides prompt and accurate information for owners seeking
 12 to refinance, avoid foreclosure, or obtain lien releases; and
- 13 c. It provides more accurate title searches and lowers the cost of
 14 title searches and title insurance.

15 25. One of the critical functions MERS provides as lien holder of record is
 16 to receive service of legal process for proceedings related to the secured property
 17 and to notify the appropriate MERS® System member or take other appropriate
 18 action to protect the security interest or collateral.

19 **FIRST CLAIM FOR RELIEF**

20 **(TO SET ASIDE VOID JUDGMENT—against all Defendants)**

21 26. Plaintiffs re-allege and incorporate by reference the allegations of all
 22 prior paragraphs of this complaint as though fully set forth herein.

23 27. On or about February 15, 2005, Defendant Daniel W. Robinson and
 24 Darla J. Robinson (jointly, the “Robinsons”) acquired title to the Property by means
 25 of a grant deed from the prior owners.

26 28. In order to fund the purchase of the Property, the Robinsons obtained a
 27 loan in the amount of \$999,950.00. The loan was secured against the Property by a
 28

1 deed of trust recorded on February 15, 2005 in the Official Records of the
2 Recorder's Office of Los Angeles County as instrument number 05 0342544 (the
3 "Deed of Trust"). A copy of the recorded deed of trust is attached as Exhibit 1 to
4 this complaint.

5 29. In the Deed of Trust, identified as a "CALIFORNIA – Single Family –
6 Fannie Mae/Freddie Mac UNIFORM INSTRUMENT – MERS" document, the
7 Robinsons agreed that MERS is the beneficiary of the Deed of Trust. The Deed of
8 Trust provides on page 1 that MERS is "nominee for Lender and Lender's
9 successors and assigns. MERS is the beneficiary under this Security Instrument."
10 The Deed of Trust provides MERS's state of incorporation as well as the address
11 and telephone number of MERS. The Deed of Trust further provides that the
12 promissory note corresponding to the recorded deed of trust "can be sold one or
13 more times without prior notice to Borrower."

14 30. On or about January 11, 2012 the Robinsons filed a civil action in the
15 Los Angeles County Superior Court, Robinson v. United Pacific Mortgage, case
16 number PC052281 (the "Robinson Action"). By this action, the Robinsons sought
17 to quiet title to the Property free and clear of the Deed of Trust and a court order
18 expunging the Deed of Trust.

19 31. Under California real property law, including but not limited to Code of
20 Civil Procedure section 762.010, a plaintiff in a quiet title action must give notice to,
21 and name as defendants, all persons who claim an interest in the property.

22 32. Prior to the time the Robinsons filed the Robinson Action, the
23 originating lender United Pacific Mortgage had transferred ownership of the note.
24 The Robinsons were aware of this fact at the time they filed the Robinson Action.

25 33. MERS remained the record beneficiary of the Deed of Trust at the time
26 the Robinson Action was filed. Despite their actual and constructive knowledge that
27 MERS was the beneficiary of record of the Deed of Trust, the Robinsons failed to
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1 name MERS as a defendant in the Robinson Action, failed to serve MERS with
2 summons and complaint in the Robinson Action, and failed to give MERS any
3 notice whatsoever that the Robinsons were seeking to affect the rights represented
4 by the Deed of Trust and to expunge the Deed of Trust.

5 34. This failure to give notice of the Robinson Action was intentional on
6 the part of the Robinsons. The Robinsons' counsel advertises that he files quiet title
7 actions so that "your House and or Home becomes foreclosable proof and cannot be
8 touched in order to satisfy any Debt, Loan and or Promissory Note previously
9 secured against it. You would then be free to either sell it, transfer it, re-encumber it
10 or just possess it free and clear of any lien." A copy of the relevant excerpt from the
11 Robinsons' counsel's website is attached as Exhibit 2 to this complaint. Another
12 website that advertises the Robinsons' counsel's services contains a section entitled,
13 "Quiet Title by default oh yeah you can," which recommends filing quiet title
14 lawsuits naming only defunct lenders in order to obtain a quiet title judgment by
15 default. A copy of the relevant excerpt from the website is attached as Exhibit 3 to
16 this complaint.

17 35. Despite the failure to name or give notice of the Robinson Action to
18 MERS, the Robinsons conducted a default prove-up hearing without informing the
19 Court that they had failed to give notice to parties who claimed an interest Deed of
20 Trust and/or in the Property. The Robinsons obtained a state court judgment that
21 purports to quiet title in the Property and to expunge the Deed of Trust, and which
22 the Robinsons recorded as "Judgment for Quiet Title and Expungement of Deed of
23 Trust" on April 25, 2013 in the Official Records of the Recorder's Office of Los
24 Angeles County as instrument number 20130621913 (the "Robinson Action
25 Judgment"). A copy of the recorded Robinson Action Judgment is attached as
26 Exhibit 4 to this complaint.

27 36. Had MERS received notice of the Robinson Action, it would have
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1 defended the action and alerted the loan servicing agent or current note owner that
2 action needed to be taken to protect the security interest.

3 37. Upon learning of the Robinson Action Judgment after that Judgment
4 was entered, MERS contacted the Robinsons' counsel and demanded that the
5 Robinsons stipulate to set it aside. But the Robinsons failed and refused to do so.

6 38. The Robinson Action Judgment is void and of no effect because it was
7 obtained despite the Robinsons' failure to serve summons and despite the
8 Robinsons' failure to give any notice of the Robinson Action. The Court in the
9 Robinson Action never acquired jurisdiction over MERS nor did it have jurisdiction
10 to quiet title to the Property and expunge the Deed of Trust because there was no
11 notice to those parties who claimed a record interest in the Property and Deed of
12 Trust.

13 39. The Robinson Action Judgment is subject to MERS's Deed of Trust
14 interests because it was obtained without the Court in the Robinson Action ever
15 acquiring jurisdiction over MERS or having jurisdiction to quiet title to the Property
16 and expunge the Deed of Trust because there was no notice to those parties who
17 claimed a record interest in the Property and Deed of Trust.

18 40. Originating lender United Pacific Mortgage never held the record
19 interest in the Property and Deed of Trust as the recorded beneficiary.

20 41. As a result of the Robinson Action and the Robinson Action
21 Judgment—all without notice to MERS—the plaintiffs were damaged in that they
22 lost the right to protect MERS's security interest in the Property and to protect the
23 interests of the note-owner(s), with whom MERS had a contractual obligation to
24 perform certain duties.

25 42. In addition to the damage and loss of customer good will associated
26 with this particular transaction, the result from the Robinson Action and Robinson
27 Action Judgment threatens the plaintiffs' overall business model. The essence of
28

1 plaintiffs' business is for MERS to serve as holder of the beneficiary or mortgagee
 2 (i.e., security) interest under a deed of trust or mortgage for the benefit of the current
 3 note owner(s). Plaintiffs protects the members' interests by receiving legal notices
 4 of foreclosures, tax sales or other proceedings impacting the note owner's equitable
 5 interests in the mortgaged property.

6 43. The Court has the power to set aside the Robinson Action Judgment,
 7 which was entered without service of process, legal notice, or any notice at all to
 8 parties whose interests the Robinson Action Judgment purports to affect. The Court
 9 must exercise that power in the plaintiffs' favor and set aside the void Robinson
 10 Action Judgment.

11 **SECOND CLAIM FOR RELIEF**

12 **(DECLARATORY JUDGMENT FOR VIOLATION OF DUE PROCESS** 13 **UNDER THE 5TH AND 14TH AMENDMENTS OF THE UNITED STATES** 14 **CONSTITUTION AND ARTICLE I, SECTION 7 OF THE CALIFORNIA** 15 **CONSTITUTION)**

16 44. Plaintiffs re-allege and incorporate by reference the allegations of all
 17 prior paragraphs of this complaint as though fully set forth herein.

18 45. The Fifth and Fourteenth Amendments to the United States
 19 Constitution protect against the deprivation of property without due process of law.
 20 The rights protected by these constitutional provisions include the guarantee of
 21 procedural due process: parties are entitled to notice reasonably calculated, under all
 22 the circumstances, to apprise interested parties of the pendency of an action that will
 23 affect their rights and an opportunity to present their objections to the action.

24 46. Similarly, Article I, Section 10, of the California Constitution protects
 25 these rights.

26 47. The beneficiary of a deed of trust (or mortgagee of a mortgage) has a
 27 substantial property interest and is entitled to notice reasonably calculated to apprise
 28

1 it of any actions that may impair the security interest.

2 48. At the time the Robinsons filed the Robinson Action, and at the time
3 they obtained the Robinson Action Judgment, MERS claimed an interest in the
4 Property as the beneficiary of the Deed of Trust. That property interest was
5 recorded in the public land records and gave notice to the Robinsons—and the
6 world—of MERS's claimed interest in the Property.

7 49. The prosecution of the Robinson Action and the issuance of the
8 Robinson Action Judgment deprived MERS of its property interest without due
9 process of law in that MERS was deprived of its claimed property interest without
10 notice or an opportunity to be heard in violation of the United States and California
11 Constitutions.

12 50. The Robinson Action and the Robinson Action Judgment constitute
13 state acts.

14 51. The violation of MERS's due process rights harmed the plaintiffs as
15 described above and the plaintiffs have no adequate remedy at law to redress this
16 harm. The issuance of the Robinson Action Judgment violates the federal and state
17 due process guarantees of the United States and California Constitutions. Therefore,
18 under 28 U.S.C. §§ 2201 and 2202, the plaintiffs seek a declaration of the Court that
19 the Robinson Action Judgment is void and of no effect.

20 **THIRD CLAIM FOR RELIEF**

21 **(CANCELLATION OF INSTRUMENTS—against all Defendants)**

22 52. Plaintiffs re-allege and incorporate by reference the allegations of all
23 prior paragraphs of this complaint as though fully set forth herein.

24 53. In conjunction with the filing of the Robinson Action, the Robinsons
25 recorded a lis pendens on May 16, 2012 in the Official Records of the Recorder's
26 Office of Los Angeles County as instrument number 20120731667. A copy of the
27 recorded lis pendens is attached as Exhibit 5 to this complaint.

1 54. As is set forth above, the Robinsons recorded the void Robinson Action
2 Judgment on April 25, 2013 in the Official Records of the Recorder's Office of Los
3 Angeles County as instrument number 20130621913.

4 55. The lis pendens was recorded improperly because the Robinsons did
5 not give notice as required by law, and the Robinson Action Judgment is void as
6 explained above. These instruments appear to be valid on their face, but are invalid
7 and void. The plaintiffs have a reasonable apprehension that if the instruments are
8 left outstanding, the plaintiffs will be harmed as the Property may be transferred,
9 sold, or otherwise encumbered. The plaintiffs are entitled to have the instruments
10 cancelled and to monetary damages from the Robinsons.

11 56. The recordation of the invalid and void instruments has made it
12 necessary for the plaintiffs to retain attorneys and bring this action to cancel the
13 instruments, and the plaintiffs are entitled to recover from the Robinsons the
14 attorney fees and costs incurred by the plaintiffs in cancelling these instruments.

15 57. The Robinsons acted intentionally or with reckless disregard for the
16 plaintiffs' rights in recording the instruments, and the plaintiffs are entitled to
17 exemplary and punitive damages against the Robinsons.

18 **FOURTH CLAIM FOR RELIEF**

19 **(SLANDER OF TITLE—against all Defendants)**

20 58. Plaintiffs re-allege and incorporate by reference the allegations of all
21 prior paragraphs of this complaint as though fully set forth herein.

22 59. On April 25, 2013 the Robinsons willfully, maliciously, and without
23 privilege or justification published false statements concerning MERS's rights and
24 title in the Deed of Trust and the Property by recording the void Robinson Action
25 Judgment, which disparaged MERS's title. By recording the void Robinson Action
26 Judgment, the Robinsons impaired the value of MERS's interest in the Deed of
27 Trust and Property, which caused and continues to cause damages to the plaintiffs.
28

1 60. The recordation of the void Robinson Action Judgment and subsequent
2 refusal to stipulate to set aside the void Robinson Action Judgment has made it
3 necessary for the plaintiffs to retain attorneys and bring this action, and the plaintiffs
4 are entitled to recover from the Robinsons the attorney fees and costs incurred by
5 the plaintiffs in this action.

6 61. The recordation of the void Robinson Action Judgment and subsequent
7 refusal to stipulate to set aside the void Robinson Action Judgment was done
8 intentionally or with reckless disregard for the plaintiffs' rights, entitling the
9 plaintiffs to exemplary and punitive damages.

10 **WHEREFORE**, the plaintiffs pray for judgment as follows:

11 1. That the Court set aside the Robinson Action Judgment and declare that
12 it is void and of no force or effect;

13 2. That the Court cancel the recorded Robinson Action Judgment and lis
14 pendens;

15 3. That the Court issue a declaration that the Robinson Action Judgment
16 is void and of no effect, that the recorded Robinson Action Judgment and lis
17 pendens are cancelled, and that the Deed of Trust remains valid;

18 4. For monetary damages according to proof;

19 5. For attorney fees and costs;

20 6. For punitive and exemplary damages; and

21 7. For such further and other relief as the Court deems proper.
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1 DATED: September 26, 2013

SEVERSON & WERSON
A Professional Corporation

By:



J. Owen Campbell

Attorneys for Plaintiffs
MORTGAGE ELECTRONIC
REGISTRATION SYSTEMS, INC. and
MERSCORP HOLDINGS, INC.

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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

NOTICE OF ASSIGNMENT TO UNITED STATES JUDGES

This case has been assigned to District Judge Stephen V. Wilson and the assigned Magistrate Judge is Alka Sagar.

The case number on all documents filed with the Court should read as follows:

2:13CV7142 SVW ASx

Pursuant to General Order 05-07 of the United States District Court for the Central District of California, the Magistrate Judge has been designated to hear discovery related motions.

All discovery related motions should be noticed on the calendar of the Magistrate Judge.

Clerk, U. S. District Court

September 26, 2013

Date

By J. Prado

Deputy Clerk

NOTICE TO COUNSEL

A copy of this notice must be served with the summons and complaint on all defendants (if a removal action is filed, a copy of this notice must be served on all plaintiffs).

Subsequent documents must be filed at the following location:

☒ Western Division
312 N. Spring Street, G-8
Los Angeles, CA 90012

☐ Southern Division
411 West Fourth St., Ste 1053
Santa Ana, CA 92701

☐ Eastern Division
3470 Twelfth Street, Room 134
Riverside, CA 92501

Failure to file at the proper location will result in your documents being returned to you.

Name & Address:

J. Owen Campbell (SBN 229976)
 SEVERSON & WERSON
 19100 Von Karman Avenue, 7th Floor
 Irvine, CA 92618
 Tel: (949) 442-7110; Fax: (949) 442-7118

UNITED STATES DISTRICT COURT
 CENTRAL DISTRICT OF CALIFORNIA

MORTGAGE ELECTRONIC REGISTRATION
 SYSTEMS, INC. and MERSCORP HOLDINGS, INC.

CASE NUMBER

PLAINTIFF(S)

CV 13-7142

SUN / ASX

v.

DANIEL W. ROBINSON and DARLA J. ROBINSON

DEFENDANT(S).

SUMMONS

TO: DEFENDANT(S):

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it), you must serve on the plaintiff an answer to the attached ☒ complaint ☐ amended complaint ☐ counterclaim ☐ cross-claim or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff's attorney, J. Owen Campbell, whose address is 19100 Von Karman Avenue, 7th Floor, Irvine, California 92612. If you fail to do so, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

Dated: _____

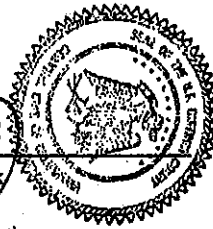
SEP 26 2013

Clerk, U.S. District Court

By: _____

Deputy Clerk

(Seal of the Court)



[Use 60 days if the defendant is the United States or a United States agency, or is an officer or employee of the United States. Allowed 60 days by Rule 12(a)(3)].

**UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET**

I. (a) PLAINTIFFS (Check box if you are representing yourself <input type="checkbox"/>) Mortgage Electronic Registration Systems, Inc. and MERSCORP Holdings, Inc.		DEFENDANTS (Check box if you are representing yourself <input type="checkbox"/>) Daniel W. Robinson and Daria J. Robinson																			
(b) Attorneys (Firm Name, Address and Telephone Number. If you are representing yourself, provide same information.) J. Owen Campbell (State Bar No. 229976) Severson & Werson 19100 Von Karman Ave., 7th Floor, Irvine, CA 92612 Tel: (949) 442-7110; Fax: (949) 442-7118; joc@severson.com		(b) Attorneys (Firm Name, Address and Telephone Number. If you are representing yourself, provide same information.) unknown at this time																			
II. BASIS OF JURISDICTION (Place an X in one box only.) <input type="checkbox"/> 1. U.S. Government Plaintiff <input type="checkbox"/> 2. U.S. Government Defendant <input checked="" type="checkbox"/> 3. Federal Question (U.S. Government Not a Party) <input type="checkbox"/> 4. Diversity (Indicate Citizenship of Parties in Item III)		III. CITIZENSHIP OF PRINCIPAL PARTIES-For Diversity Cases Only (Place an X in one box for plaintiff and one for defendant) <table style="width:100%; border: none;"> <tr> <td style="width: 50%;">Citizen of This State</td> <td style="width: 10%;">PTF <input type="checkbox"/> 1</td> <td style="width: 10%;">DEF <input type="checkbox"/> 1</td> <td style="width: 30%;">Incorporated or Principal Place of Business in this State</td> <td style="width: 10%;">PTF <input type="checkbox"/> 4</td> <td style="width: 10%;">DEF <input type="checkbox"/> 4</td> </tr> <tr> <td>Citizen of Another State</td> <td>PTF <input type="checkbox"/> 2</td> <td>DEF <input type="checkbox"/> 2</td> <td>Incorporated and Principal Place of Business in Another State</td> <td>PTF <input type="checkbox"/> 5</td> <td>DEF <input type="checkbox"/> 5</td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td>PTF <input type="checkbox"/> 3</td> <td>DEF <input type="checkbox"/> 3</td> <td>Foreign Nation</td> <td>PTF <input type="checkbox"/> 6</td> <td>DEF <input type="checkbox"/> 6</td> </tr> </table>		Citizen of This State	PTF <input type="checkbox"/> 1	DEF <input type="checkbox"/> 1	Incorporated or Principal Place of Business in this State	PTF <input type="checkbox"/> 4	DEF <input type="checkbox"/> 4	Citizen of Another State	PTF <input type="checkbox"/> 2	DEF <input type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	PTF <input type="checkbox"/> 5	DEF <input type="checkbox"/> 5	Citizen or Subject of a Foreign Country	PTF <input type="checkbox"/> 3	DEF <input type="checkbox"/> 3	Foreign Nation	PTF <input type="checkbox"/> 6	DEF <input type="checkbox"/> 6
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Citizen or Subject of a Foreign Country	PTF <input type="checkbox"/> 3	DEF <input type="checkbox"/> 3	Foreign Nation	PTF <input type="checkbox"/> 6	DEF <input type="checkbox"/> 6																
IV. ORIGIN (Place an X in one box only.) <input checked="" type="checkbox"/> 1. Original Proceeding <input type="checkbox"/> 2. Removed from State Court <input type="checkbox"/> 3. Remanded from Appellate Court <input type="checkbox"/> 4. Reinstated or Reopened <input type="checkbox"/> 5. Transferred from Another District (Specify) <input type="checkbox"/> 6. Multi-District Litigation																					
V. REQUESTED IN COMPLAINT: JURY DEMAND: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (Check "Yes" only if demanded in complaint.) CLASS ACTION under F.R.Cv.P. 23: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> MONEY DEMANDED IN COMPLAINT: \$ according to proof																					
VI. CAUSE OF ACTION (Cite the U.S. Civil Statute under which you are filing and write a brief statement of cause. Do not cite jurisdictional statutes unless diversity.) 28 U.S.C. 2201 and 2202. Action to set aside a void judgment obtained without notice in violation of the 5th and 14th Amendments to the United States Constitution.																					
VII. NATURE OF SUIT (Place an X in one box only.)																					
<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce/ICC Rates/Etc. <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced & Corrupt Org. <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input checked="" type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Info. Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Admin. Procedures Act/Review of Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes	<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loan (Excl. Vet.) <input type="checkbox"/> 153 Recovery of Overpayment of Vet. Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment	<input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Fed. Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury-Med Malpractice <input type="checkbox"/> 365 Personal Injury-Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability	<input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability <input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 American with Disabilities-Employment <input type="checkbox"/> 446 American with Disabilities-Other <input type="checkbox"/> 448 Education	Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus/Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee Conditions of Confinement <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR: <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Ret. Inc. Security Act	<input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405 (g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405 (g)) <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS-Thrd Party 26 USC 7609																

FOR OFFICE USE ONLY:

Case Number:

CV13-7142

I. (a) PLAINTIFFS (Check box if you are representing yourself ☐)

Mortgage Electronic Registration Systems, Inc. and MERSCORP Holdings, Inc.

DEFENDANTS (Check box if you are representing yourself ☐)

Daniel W. Robinson and Darla J. Robinson

(b) Attorneys (Firm Name, Address and Telephone Number. If you are representing yourself, provide same information.)J. Owen Campbell (State Bar No. 229976)
Severson & Werson
19100 Von Karman Ave., 7th Floor, Irvine, CA 92612
Tel: (949) 442-7110; Fax: (949) 442-7118; joc@severson.com**(b) Attorneys** (Firm Name, Address and Telephone Number. If you are representing yourself, provide same information.)
unknown at this time**II. BASIS OF JURISDICTION** (Place an X in one box only.)

- ☐ 1. U.S. Government Plaintiff
- ☒ 3. Federal Question (U.S. Government Not a Party)
- ☐ 2. U.S. Government Defendant
- ☐ 4. Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES-For Diversity Cases Only
(Place an X in one box for plaintiff and one for defendant)

- | | PTF | DEF | | PTF | DEF |
|-----------------------------------------|----------------------------|----------------------------|---------------------------------------------------------------|----------------------------|----------------------------|
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business in this State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business in Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. ORIGIN (Place an X in one box only.)

- ☒ 1. Original Proceeding
- ☐ 2. Removed from State Court
- ☐ 3. Remanded from Appellate Court
- ☐ 4. Reinstated or Reopened
- ☐ 5. Transferred from Another District (Specify)
- ☐ 6. Multi-District Litigation

V. REQUESTED IN COMPLAINT: JURY DEMAND: ☐ Yes ☒ No (Check "Yes" only if demanded in complaint.)**CLASS ACTION under F.R.Cv.P. 23:** ☐ Yes ☒ No **MONEY DEMANDED IN COMPLAINT:** \$ according to proof**VI. CAUSE OF ACTION** (Cite the U.S. Civil Statute under which you are filing and write a brief statement of cause. Do not cite jurisdictional statutes unless diversity.)
28 U.S.C. 2201 and 2202. Action to set aside a void judgment obtained without notice in violation of the 5th and 14th Amendments to the United States Constitution.**VII. NATURE OF SUIT** (Place an X in one box only.)

OTHER STATUTES	CONTRACT	REAL PROPERTY CONT.	IMMIGRATION	PRISONER PETITIONS	PROPERTY RIGHTS
<input type="checkbox"/> 375 False Claims Act	<input type="checkbox"/> 110 Insurance	<input type="checkbox"/> 240 Torts to Land	<input type="checkbox"/> 462 Naturalization Application	Habeas Corpus:	<input type="checkbox"/> 820 Copyrights
<input type="checkbox"/> 400 State Reapportionment	<input type="checkbox"/> 120 Marine	<input type="checkbox"/> 245 Tort Product Liability	<input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 463 Alien Detainee	<input type="checkbox"/> 830 Patent
<input type="checkbox"/> 410 Antitrust	<input type="checkbox"/> 130 Miller Act	<input type="checkbox"/> 290 All Other Real Property	TORTS	<input type="checkbox"/> 510 Motions to Vacate Sentence	<input type="checkbox"/> 840 Trademark
<input type="checkbox"/> 430 Banks and Banking	<input type="checkbox"/> 140 Negotiable Instrument	PERSONAL PROPERTY	PERSONAL PROPERTY	<input type="checkbox"/> 530 General	SOCIAL SECURITY
<input type="checkbox"/> 450 Commerce/ICC Rates/Etc.	<input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment	<input type="checkbox"/> 310 Airplane	<input type="checkbox"/> 370 Other Fraud	<input type="checkbox"/> 535 Death Penalty	<input type="checkbox"/> 861 HIA (1395ff)
<input type="checkbox"/> 460 Deportation	<input type="checkbox"/> 151 Medicare Act	<input type="checkbox"/> 315 Airplane Product Liability	<input type="checkbox"/> 371 Truth in Lending	Other:	<input type="checkbox"/> 862 Black Lung (923)
<input type="checkbox"/> 470 Racketeer Influenced & Corrupt Org.	<input type="checkbox"/> 152 Recovery of Defaulted Student Loan (Excl. Vet.)	<input type="checkbox"/> 320 Assault, Libel & Slander	<input type="checkbox"/> 380 Other Personal Property Damage	<input type="checkbox"/> 540 Mandamus/Other	<input type="checkbox"/> 863 DIWC/DIWW (405 (g))
<input type="checkbox"/> 480 Consumer Credit	<input type="checkbox"/> 153 Recovery of Overpayment of Vet. Benefits	<input type="checkbox"/> 330 Fed. Employers' Liability	<input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 550 Civil Rights	<input type="checkbox"/> 864 SSID Title XVI
<input type="checkbox"/> 490 Cable/Sat TV	<input type="checkbox"/> 160 Stockholders' Suits	<input type="checkbox"/> 340 Marine	BANKRUPTCY	<input type="checkbox"/> 555 Prison Condition	<input type="checkbox"/> 865 RSI (405 (g))
<input type="checkbox"/> 850 Securities/Commodities/Exchange	<input type="checkbox"/> 155 Recovery of Overpayment of Vet. Benefits	<input type="checkbox"/> 345 Marine Product Liability	<input type="checkbox"/> 422 Appeal 28 USC 158	<input type="checkbox"/> 560 Civil Detainee Conditions of Confinement	FEDERAL TAX SUITS
<input checked="" type="checkbox"/> 890 Other Statutory Actions	<input type="checkbox"/> 160 Stockholders' Suits	<input type="checkbox"/> 350 Motor Vehicle	<input type="checkbox"/> 423 Withdrawal 28 USC 157	FORFEITURE/PENALTY	<input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant)
<input type="checkbox"/> 891 Agricultural Acts	<input type="checkbox"/> 190 Other Contract	<input type="checkbox"/> 355 Motor Vehicle Product Liability	CIVIL RIGHTS	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881	<input type="checkbox"/> 871 IRS-Third Party 26 USC 7609
<input type="checkbox"/> 893 Environmental Matters	<input type="checkbox"/> 195 Contract Product Liability	<input type="checkbox"/> 360 Other Personal Injury	<input type="checkbox"/> 440 Other Civil Rights	<input type="checkbox"/> 690 Other	
<input type="checkbox"/> 895 Freedom of Info. Act	<input type="checkbox"/> 196 Franchise	<input type="checkbox"/> 362 Personal Injury-Med Malpractice	<input type="checkbox"/> 441 Voting	LABOR	
<input type="checkbox"/> 896 Arbitration	REAL PROPERTY	<input type="checkbox"/> 365 Personal Injury-Product Liability	<input type="checkbox"/> 442 Employment	<input type="checkbox"/> 710 Fair Labor Standards Act	
<input type="checkbox"/> 899 Admin. Procedures Act/Review of Appeal of Agency Decision	<input type="checkbox"/> 210 Land Condemnation	<input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability	<input type="checkbox"/> 443 Housing/Accommodations	<input type="checkbox"/> 720 Labor/Mgmt. Relations	
<input type="checkbox"/> 950 Constitutionality of State Statutes	<input type="checkbox"/> 220 Foreclosure	<input type="checkbox"/> 368 Asbestos Personal Injury Product Liability	<input type="checkbox"/> 445 American with Disabilities-Employment	<input type="checkbox"/> 740 Railway Labor Act	
	<input type="checkbox"/> 230 Rent Lease & Ejectment		<input type="checkbox"/> 446 American with Disabilities-Other	<input type="checkbox"/> 751 Family and Medical Leave Act	
			<input type="checkbox"/> 448 Education	<input type="checkbox"/> 790 Other Labor Litigation	
				<input type="checkbox"/> 791 Employee Ret. Inc. Security Act	

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Case Number: _____

VIII. VENUE: Your answers to the questions below will determine the division of the Court to which this case will most likely be initially assigned. This initial assignment is subject to change, in accordance with the Court's General Orders, upon review by the Court of your Complaint or Notice of Removal.

Question A: Was this case removed from state court? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "no," go to Question B. If "yes," check the box to the right that applies, enter the corresponding division in response to Question D, below, and skip to Section IX.	STATE CASE WAS PENDING IN THE COUNTY OF:		INITIAL DIVISION IN CACD IS:
	<input type="checkbox"/> Los Angeles		Western
	<input type="checkbox"/> Ventura, Santa Barbara, or San Luis Obispo		Western
	<input type="checkbox"/> Orange		Southern
	<input type="checkbox"/> Riverside or San Bernardino		Eastern

Question B: Is the United States, or one of its agencies or employees, a party to this action? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "no," go to Question C. If "yes," check the box to the right that applies, enter the corresponding division in response to Question D, below, and skip to Section IX.	If the United States, or one of its agencies or employees, is a party, is it:		INITIAL DIVISION IN CACD IS:
	A PLAINTIFF? Then check the box below for the county in which the majority of DEFENDANTS reside.	A DEFENDANT? Then check the box below for the county in which the majority of PLAINTIFFS reside.	
	<input type="checkbox"/> Los Angeles	<input type="checkbox"/> Los Angeles	Western
	<input type="checkbox"/> Ventura, Santa Barbara, or San Luis Obispo	<input type="checkbox"/> Ventura, Santa Barbara, or San Luis Obispo	Western
	<input type="checkbox"/> Orange	<input type="checkbox"/> Orange	Southern
	<input type="checkbox"/> Riverside or San Bernardino	<input type="checkbox"/> Riverside or San Bernardino	Eastern
	<input type="checkbox"/> Other	<input type="checkbox"/> Other	Western

Question C: Location of plaintiffs, defendants, and claims?	A. Los Angeles County	B. Ventura, Santa Barbara, or San Luis Obispo Counties	C. Orange County	D. Riverside or San Bernardino Counties	E. Outside the Central District of California	F. Other
Indicate the location in which a majority of plaintiffs reside:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Indicate the location in which a majority of defendants reside:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Indicate the location in which a majority of claims arose:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

C.1. Is either of the following true? If so, check the one that applies: <input type="checkbox"/> 2 or more answers in Column C <input type="checkbox"/> only 1 answer in Column C and no answers in Column D Your case will initially be assigned to the SOUTHERN DIVISION. Enter "Southern" in response to Question D, below. If none applies, answer question C2 to the right. →	C.2. Is either of the following true? If so, check the one that applies: <input type="checkbox"/> 2 or more answers in Column D <input type="checkbox"/> only 1 answer in Column D and no answers in Column C Your case will initially be assigned to the EASTERN DIVISION. Enter "Eastern" in response to Question D, below. If none applies, go to the box below. ↓
Your case will initially be assigned to the WESTERN DIVISION. Enter "Western" in response to Question D below.	

Question D: Initial Division?	INITIAL DIVISION IN CACD
Enter the initial division determined by Question A, B, or C above: →	Western

UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA

CIVIL COVER SHEET

IX(a). IDENTICAL CASES: Has this action been previously filed in this court and dismissed, remanded or closed? ☒ NO ☐ YES

If yes, list case number(s): _____

IX(b). RELATED CASES: Have any cases been previously filed in this court that are related to the present case? ☒ NO ☐ YES

If yes, list case number(s): _____

Civil cases are deemed related if a previously filed case and the present case:

(Check all boxes that apply)

- ☐ A. Arise from the same or closely related transactions, happenings, or events; or
- ☐ B. Call for determination of the same or substantially related or similar questions of law and fact; or
- ☐ C. For other reasons would entail substantial duplication of labor if heard by different judges; or
- ☐ D. Involve the same patent, trademark or copyright, and one of the factors identified above in a, b or c also is present.

X. SIGNATURE OF ATTORNEY

(OR SELF-REPRESENTED LITIGANT):

DATE: September 26, 2013

Notice to Counsel/Parties: The CV-71 (JS-44) Civil Cover Sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law. This form, approved by the Judicial Conference of the United States in September 1974, is required pursuant to Local Rule 3-1 is not filed but is used by the Clerk of the Court for the purpose of statistics, venue and initiating the civil docket sheet. (For more detailed instructions, see separate instructions sheet).

Key to Statistical codes relating to Social Security Cases:

Nature of Suit Code	Abbreviation	Substantive Statement of Cause of Action
861	HIA	All claims for health insurance benefits (Medicare) under Title 18, Part A, of the Social Security Act, as amended. Also, include claims by hospitals, skilled nursing facilities, etc., for certification as providers of services under the program. (42 U.S.C. 1935FF(b))
862	BL	All claims for "Black Lung" benefits under Title 4, Part B, of the Federal Coal Mine Health and Safety Act of 1969. (30 U.S.C. 923)
863	DIWC	All claims filed by insured workers for disability insurance benefits under Title 2 of the Social Security Act, as amended; plus all claims filed for child's insurance benefits based on disability. (42 U.S.C. 405 (g))
863	DIWW	All claims filed for widows or widowers insurance benefits based on disability under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405 (g))
864	SSID	All claims for supplemental security income payments based upon disability filed under Title 16 of the Social Security Act, as amended.
865	RSI	All claims for retirement (old age) and survivors benefits under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405 (g))